

Comments from statutory agencies (6)

Comment 1 (South West Water)

Statement noting the content of the Neighbourhood Plan and confirming that the anticipated level of housing growth would not cause difficulties to SWW.

Noted with thanks.

Comment 2 (Devon and Cornwall Constabulary)

Request for following statement to be added to the document:

"All development proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion."

Agreed. Change to document has been made.

Comment 3 (Natural England)

Acknowledgement, but no formal comments.

Noted.

Comment 4 (Cornwall Wildlife Trust)

Note that Sites of Importance for Natural Conservation (SINCs) have been renamed as County Wildlife Sites (CWSs).

Agreed. Change to document has been made.

Suggestion that reference be made to Cornwall Council's biodiversity Supplementary Planning Document and wildlife specific development measures.

Agreed. Change to document has been made.

Suggestion that reference be made to Cornwall Council's Environmental Growth Strategy.

Agreed. Change to document has been made.

Suggestion that reference be made to specific policies within Cornwall Council's Biodiversity Supplementary Planning Document.

Not agreed. The St Enoder Neighbourhood Plan will sit within a wider policy framework and it is not the intention of the document to duplicate policies or re-state guidelines included within other documents.

Comment 5 (National Grid)

Acknowledgement, but no formal comments.

Noted.

Comment 6 (Historic England)

Reference to previous correspondence relating to a screening opinion, which was undertaken prior to the consultation into the pre-submission draft. A number of issues were raised and these were addressed in a response from the working group, which was deemed acceptable by Historic England, subject to confirmation that the "historic environment expertise" within the unitary authority had substantiated the evidence from the working group.

Noted. No specific changes to the document from the Historic England comments.

The relevant correspondence was as follows:

Correspondence from Historic England (22nd October 2018)

Thank you for your consultation on the SEA Screening Opinion for the St Enoder Neighbourhood Plan. This is our first involvement in the Plan's preparation since we provided initial advice on the area's designation in the summer of 2014 so this provides a welcome opportunity for us to familiarise ourselves with its contents.

Our focus is on sites which are proposed for development and these take the form of Housing Policy 2 (p12), Employment Policy 1 (p23), and the ambiguous provision for future housing on site FG1 Identified as Direction of Future Growth on p14.

There is no information on the Plan's website of any site assessment process which may have been used to inform the above. You have kindly provided an extract from a document created by your authority which identifies the location of designated heritage assets in relation to the housing sites identified in Policy 2. This is elaborated upon within the SEA Screening Report but there is no suggestion of a formal site assessment process having been carried out as part of the Plan preparation process. The information supplied does not address the other sites referred to above.

The Screening Report goes into detail on the relationships between sites HL1 – 4 and relevant designated heritage assets on p15. On this basis we have no objection to the conclusions reached on sites HL1, 2 & 4 but have reservations about site HL3. It is asserted that existing development separates the site from the nearby Queen's Pit Preaching Pit Scheduled Monument and as such more development would not further impact on the setting of the asset. But from the Map (Large map 2) included in the Plan it is clear that the area of land specifically allocated for housing would extend south beyond what could be defined as an ambient settlement boundary and potentially create new lines of intervisibility. This may or may not have a harmful effect on the setting of the Monument but we would wish to see more evidence on this point before arriving at any position. In the absence of this we consider any conclusions to be premature.

Employment Policy 1 seeks to promote employment related development on what appear to be existing relevant sites. Some of these sites have proposed boundaries which appear to extend into currently undeveloped land, some of which may have potential for impact on designated heritage assets but in the absence of evidence this is unclear. We appreciate that no specific type or quanta of development is advocated in the policy and that other policy provisions in the Plan and elsewhere may be able to provide adequate protection for heritage assets as and when appropriate. At the same time, there could be a risk of creating development expectations which, when necessary constraints mapping is undertaken, have difficulty being realised, and a reiteration within the policy of the need for accommodation of heritage and contextual distinctiveness considerations might be useful.

The provision of site FG1 for priority housing allocation at some point in the future is not the subject of policy but there is potential for it to be brought forward for development within the Plan period. There is no evidence to substantiate this provision and should review of Housing Policy 5 suggest it there is clear articulation that it is deemed suitable for housing. We consider the status of this provision unhelpful and in the absence of evidence a hostage to fortune commitment which may have potential to cause harm to designated heritage assets. We would therefore suggest that this wording be more qualified to dilute the risk identified or converted into a policy with appropriate evidence to substantiate it.

As the Plan and its evidence stands therefore we regrettably do not believe that sufficient evidence exists to support the conclusion of the Screening Report that significant environmental effects are unlikely and that an SEA is not required.

We would encourage attention being given to the points we have raised and would be happy to review our position on receipt of further information.

Response from working group (27th November 2017)

On behalf of the Neighbourhood Plan Working Group, I have additional information for David Stuart, Historic England's Historic Places Adviser South West.

HL3

Concern has been expressed about a potential impact of the proposed housing allocation (HL3) on the Indian Queens Preaching Pit (Scheduled Monument). I can assure Mr Stuart that there would be no intervisibility between the two. The monument itself is a hollow that is well-screened by residential properties to the north, south and east. The west, there is a large yard for a contracting (tarmac) firm. The land at HL3 is some distance further to the west, and would itself be to the west of an existing housing state.

In addition, it should be noted that the land identified as HL3 has an extant planning consent for a housing development, which has been implemented though it is presently stalled – see PA11/01329.

It can be added that when the application was agreed, historic environment professionals within Cornwall Council did not raise any objections and were clear that there was no impact on designated heritage assets.

Employment Policy 1

Mr Stuart correctly notes that “Employment Policy 1 seeks to promote employment related development on what appear to be existing relevant sites.” He adds that “some of these sites have proposed boundaries which appear to extend into currently undeveloped land, some of which may have potential for impact on designated heritage assets ...”

We have reviewed the sites identified in Employment Policy 1. All have either been developed already or are on previously-developed land (ie. EL5 which includes late 20th century farm buildings) – except for two.

EL1

Mapping shows a significant amount of greenfield land to be developed within this allocation. However, it needs to be noted that this has been allocated employment land in various Restormel Borough Council / Cornwall Council documents for two decades. It is also identified as a “strategically important employment site” in the Cornwall Local Plan Allocations DPD (Development Plan Document). See policy C-E4: “Indian Queens Moorland Road Industrial Estate.”

In addition, we can confirm that planning permission for the undeveloped element of this estate was granted in 2017 and it is presently being built out.

It can nonetheless be pointed out that the land is between the existing industrial estate and the A30 trunk road through Cornwall and there was no impact on designated heritage assets (as shown by the responses to the planning application from historic environment professionals within Cornwall Council).

EL6

The western-part of this allocation includes a section of undeveloped field. This has been included on the mapping in error and will be removed before the formal consultation on the document.

Direction of Future Growth

Mr Stuart also notes that “the provision of site FG1 for priority housing allocation at some point in the future is not the subject of policy but there is potential for it to be brought forward for development within the Plan period.”

FG1 has been identified for future growth, partly so that a new road can be constructed toward Indian Queens Primary School.

Development in this area would be brought forward, as part of a formal review of the housing policies in the Neighbourhood Plan as noted elsewhere.

In addition, there would be no adverse impact on any Scheduled Monuments or Listed Buildings, which are listed in Appendix 1 of the document. None are within the immediate area of the site. In addition, no archaeological sites are shown in FG1 from either the Historic Environment Record or the National Mapping Programme. Immediately adjacent are the remains of the short-lived 19th century Parka Mine, and other policies in the Neighbourhood Plan and Cornwall Local Plan would ensure that appropriate recording of any archaeological remains would be undertaken, should this land be taken forward in 2022-2023.

Correspondence from Historic England (10th December 2018)

The further information from the St Enoder NDP team responds to all the points made in our previous advice. It is a mix of clarification on matters of judgement ie intervisibility, setting, etc, and factual updates – prior consents, input from Cornwall Council etc.

Without necessarily disputing them the former remain essentially assertions which we cannot verify due to an absence of additional evidence to substantiate them and a lack of local knowledge on our part. The factual updates we assume to be accurate but must depend on your authority to confirm its position where it has had a role to play.

Overall therefore, as with other previous scenarios like this, we are dependent upon, and happy to defer to, the heritage and planning expertise within the Council to confirm that the Plan does not generate harmful impacts on relevant heritage assets. This would be the quickest and simplest way to satisfactorily address the points we have raised, confirm that an SEA is not required, and allow the Plan preparation process to move on!

Correspondence from Sarah Furley, Cornwall Council (31st December 2018)

As requested I have screened the St Enoder Parish Neighbourhood Development Plan (NDP) to see whether the plan requires Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA.)

As required by the SEA regulations I produced a screening opinion report for the St Enoder NDP (draft 2) and consulted the statutory bodies: Natural England, Historic England and the Environment Agency. I also asked Natural England to confirm whether or not HRA was required under the HRA directive.

Based on the scale and location of development proposed in the draft plan and the sensitivity of the parish environment, Cornwall Council is of the opinion that the St Enoder Parish NDP is unlikely to have significant effects

on the environment or on European Sites and that SEA and HRA is therefore not required.

Historic England initially raised some further queries and further evidence was provided.

This view is now confirmed by the consultation bodies and the full screening opinion and the responses from Natural England and Historic England ...

If significant changes or additions are made to your plan I would advise you to have it rescreened.

Statement from Cornwall Council's Strategic Historic Environment Team (Nick Cahill)

A further comment was received from Mr Cahill which suggested that the first of the two historic environment policies be beefed up. He suggested text around historic environment impact assessments, as follows:

...which requires the historic environment impact assessments to

- 1. Identify the site, the heritage assets and their settings*
- 2. Understand its significance, its sensitivities and capacity for change irrespective of any known proposals*
- 3. Understand the potential impact of specific proposals on that significance*
- 4. Use that understanding to inform the design process to:
 - i. look for opportunities to avoid, minimise or mitigate impact*
 - ii. look for opportunities to better reveal or enhance significance, create a more sustainable and interesting place*
 - iii. justify any harmful impacts (in terms of sustainable development, the need for change, overriding benefits)*
 - iv. offset negative impacts through recording, disseminating and archiving archaeological and historical information.**

Agreed. Change to the supporting text within the document has been made.

Feedback from Cornwall Council planners

HOUSING POLICY 2 – reference to harm should specify material harm.

EMPLOYMENT POLICY 1 – reference to harm might better be worded for schemes to “safeguard amenities of ...”

EMPLOYMENT POLICY 5: TOURISM – control of tourist accommodation should be through a planning condition, not an obligation.

Comments from local residents (12)

Comment 1

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 2

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 3

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 4

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 5

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 6

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 7

Statement of support for the Neighbourhood Plan, which pointed out a typographical error.

Noted with thanks. The typographical error has been corrected, along with others noted by the working group.

Comment 8

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 9

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 10

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 11

Statement of support for the Neighbourhood Plan.

Noted with thanks.

Comment 12

Request that HOUSING POLICY 3 covering infill in hamlets / rural settlements be amended to include discreet blocks of housing away from the key settlements of Fraddon, Indian Queens, St Columb Road and Summercourt.

Agreed. Change to document has been made.

Landowners (9)

Comment 1 (Kingsley Developments (SW) Ltd)

Statement challenging housing target of 150 housing units for the period and that the document does not state that this is a minimum figure. It also queries whether the target was agreed with the unitary authority. [HOUSING POLICY 1]

Not agreed. The document does not state that the target is a maximum and the housing target was agreed with Cornwall Council.

The background information on this matter is actually included within the draft of the St Enoder NDP on page 11 as follows:

"The unitary authority has confirmed that St Enoder's share of this projected growth is 346 housing units during the above time period. However, in relation to this target, it should be noted that between April 2010 and April 2018, a total of 200 new properties were completed within St Enoder Parish."

"In devising the policies in this section of the Plan, the working group: Accepted Cornwall Council's recommendation on the pro-rata share of housing target for the China Clay Area and agreed that the overall target for St Enoder Parish should be 350 housing units between 2010 and 2030. Agreed that the Plan should include a housing target for the period 2018-2030, with housing units constructed between 2010 and 2018 discounted from the overall target for period 2010-2030."

A footnote on page 11 noted that an email from Cornwall Council confirmed the projected growth figure of 346 housing units.

The email came from Martin Cookman (Group Leader – Local Planning), Planning Housing and Regeneration, Cornwall Council. It was dated 19th July 2016 and stated the following:

"I have worked out the figures as follows after adjusting the Treverbyn share:

St Enoder pro rata share of 1800 at 19.2% is 346

Completions 120
 Permissions 223
 Shortfall of 3"

Statement challenging approach to settlement boundaries and development outside of settlement boundaries, including infill and rounding off in rural areas, and previously developed land. [HOUSING POLICY 2]

Not agreed. The use of settlement boundaries and related policies is consistent with many other district and Neighbourhood Plans. In addition, guidance has been sought from senior planning officers at Cornwall Council that the approach on these matters is legitimate.

Statements challenging whether there are sufficient consents / allocations to deliver the housing target in the document. The representation claims that evidence is only provided for 112 units (from the four allocated sites), that the reference to extant consents (182) has not been evidenced and the statement about "capacity ... of more than 200 housing units" could not be substantiated.

Not agreed. At the present time, there are extant consents for 230 housing units within St Enoder Parish, as set out below. The evidence for the 182 extant planning permissions within St Enoder Parish at the beginning of April 2018 came from Cornwall Council's annual monitoring report for 2017-2018. The statement in the Neighbourhood Plan which refers to "capacity" has been updated and reworded for clarity.

Listed below is an updated table showing of extant consents, as at 20th March 2018. The right-hand column specifies progress with the developments (ie. completion in 2018-2019, under construction, not started).

Applic. no	Location	No of units	-
C2/01/01151	Suncrest Estate, Indian Queens	59	U/C ¹
C2/07/01684	Redgate Farm, Indian Queens	6	Material start
C2/07/01225	Rear of Kilburn, Fraddon	4	Material start
C2/10/00454	Palm Court, Fraddon Hill	3	Completed
PA11/01329	Rear of Lindsay Fields, Fraddon	23	Material start ²
PA12/04055	Heidelberg, Gaverigan	1	Completed
PA12/07125	Keat's Tenement, Goss Moor	1	U/C
PA12/11980	Tresithney Farm	1	U/C
PA13/06950	Little Halloon Farm, Indian Queens	1	U/C
PA13/09015	Quistreham, Indian Queens	1	U/C
PA14/11476	Rear of Blue Anchor Cottages, Fraddon	1	Material start
PA14/04231	Penare Farm, Fraddon	2	U/C

¹ This development was for 77 units of which 18 have been built.

² A material start has been made on this site in order to safeguard the consent. It was an exception site has now been included as an allocation within the St Enoder Neighbourhood Plan.

PA15/02430	Pedna Carne, Higher Fraddon	9	U/C
PA15/04131	The Joinery, St Columb Road	7	U/C
PA15/05114	Rear of Smithy, Black Cross	1	U/C
PA15/05874	Adj. Rock House, Summercourt	5	N/S
PA15/08863	Old Butchers Shop, St Columb Road	1	Completed
PA16/06567	Wyndhurst, St Dennis Junction	1	N/S
PA16/07541	Trebarkea, St Columb Road	1	U/C
PA16/08833	Ymir House, St Columb Road	1	N/S
PA16/09761	Pentamur House, Higher Fraddon	2	N/S
PA16/06903	Pen-y-Thon, Chapeltown	1	N/S
PA16/09352	Kelliers	1	N/S
PA16/10947	East of Carne Villas, Summercourt	1	Completed
PA17/00516	Former engine house, Toldish	1	N/S
PA17/02657	Moorland Road, Indian Queens	4	U/C
PA17/03125	Adj. Letcherville, Fraddon	5	U/C
PA17/03619	Barn east of Whitecross	1	Completed
PA17/03730	Little Harvenna, Higher Fraddon	1	N/S
PA17/04473	Trevan, St Columb Road	1	U/C
PA17/06551	Lyndhurst, Summercourt	1	U/C
PA17/07906	NE of Chytane Farm	1	N/S
PA17/08946	The Gables, Indian Queens	1	U/C
PA17/09279	Barn at Little Resparva, Chapeltown	1	N/S
PA17/09304	North of Kimberley, Summercourt	1	N/S
PA17/11382	Queens Pit Bungalow, Fraddon	1	N/S
PA17/11615	The Nutshell, Gummows Shop	1	N/S
		154 units	

In addition to the above figures, a further 76 housing units have been consented in the last year (2018-2019). These are as follows:

Further consents agreed in 2018-2019			
PA15/02753	Site of Stables, Whitecross	1	N/S
PA16/11042	East of Cobble Lane, Fraddon	6	N/S
PA17/04593	Sunny Lodge, Trevarren	1	Completed
PA17/11251	Trenithon Farm	1	N/S
PA18/02324	Carnego Lane, Summercourt	1	N/S
PA18/03389	Bodanna Farm	1	Completed
PA18/04292	John Julian Depository, St Columb Road	10	N/S
PA18/05996	Tregosel, Highgate Hill	1	Completed

PA18/6258	Trenithon Farm	3	N/S
PA18/06818	Rowan, Fraddon	3	U/C
PA18/07054	The Orchard, Indian Queens	3	N/S
PA18/08130	South of Gaie Vue, Fraddon	4	N/S
PA18/08789	Lucerne, St Columb Road	1	N/S
PA18/08874	Penllyn, St Columb Road	1	N/S
PA18/09371	Mitchell Fruit Farm, Mitchell	26	N/S
PA18/07626	East of car showroom, Summercourt	13	N/S
		76 units	

Please note: the above list does not include PA14/00882 (20 housing units) which lapsed in June 2019 or PA14/09266 (16 housing units), which has been surpassed by PA18/04292 (10 housing units). These had previously been listed in Cornwall Council's database of live consents

Request for site at Fraddon (north west of Fraddon Hill) to be included as an allocation within the St Enoder Neighbourhood Plan.

Not agreed. The possible inclusion of this land had been considered prior to the completion of the pre-submission draft. An additional allocation is not to be made. This decision was taken because of the level of extant planning consents, capacity within the settlement boundaries including HL2, the agreed location of further growth (FG1) which would provide an additional road link to Indian Queens Primary School, and the commitment to review housing delivery in 2022/2023.

Statement challenging approach to infill and rounding off in small rural settlements, which specifies "one or two housing units." [HOUSING POLICY 3]
Not agreed. Paragraph 1.68 of the Cornwall Local Plan refers to "infill" sites of "one-two housing units" in "smaller villages and hamlets."

Statement challenging approach to location of exception sites and growth limits. [HOUSING POLICY 4]

Not agreed. The settlement boundaries along our communities, which have a very linear character, allows significant potential for the development of exception sites. In addition, the growth limits prevent the further elongation of existing settlements, as explained in the Neighbourhood Plan itself.

Statement challenging use of word "may" – rather than "will" – in EMPLOYMENT POLICY 5.

Agreed. Change to document has been made.

Statement challenging why land adjacent to the Carvynick Holiday Park had not been allocated in the Plan for tourism, adding that they had been advised that it "would be included" as an allocation. [EMPLOYMENT POLICY 5]

Not agreed. An additional allocation is not to be made. Kingsley Developments (SW) Ltd had not previously made any written representation to the working group on this matter and the working group did not advise that the land would be included in the document as an allocation. It is considered that EMPLOYMENT POLICY 5 is supportive of the appropriate expansion of tourist sites.

Statement challenging the need for a planning condition to ensure that holiday accommodation is used for the purposes of holiday accommodation.

[EMPLOYMENT POLICY 5]

Not agreed. It is normal practice for holiday accommodation to be conditioned as such and it should be noted that 38 units were recently consented at Carvynick (PA18/10844) with a holiday condition. The policy has been reworded to refer to "planning condition" rather than "planning obligation."

Statement pointing out that the Plan misrepresents Policy 27 (Traffic) from the Cornwall Local Plan.

Agreed. Change to document has been made.

Statement challenging the car parking standards within TRAFFIC POLICY 2.

Not agreed. The working group has considered paragraph 105 of the NPPF in its deliberations. Many Neighbourhood Plans have similar "two-car" policies and this Plan includes a "special circumstances" clause where it would not be possible for developments to make provision for two car parking spaces.

Concern challenging statement that employment-related development should not cause "an increase in traffic through the residential parts of St Ender Parish. [TRAFFIC POLICY 3]

Agreed that policy would be inappropriate and unworkable. Change to document has been made.

Comment 2 (Legacy Properties)

Statement challenging whether there is an adequate housing trajectory to deliver the target of 150 housing units for the plan period and that the document does not state that this is a minimum figure. [HOUSING POLICY 1]

Not agreed. The document does not state that the target is a maximum. As noted above, at the present time, there are extant consents for 230 housing units within St Ender Parish. The statement in the Neighbourhood Plan which refers to "capacity" has been updated and reworded for clarity.

Statement challenging the Plan's approach to the delivery of affordable housing and the difficulty to deliver such properties on exception sites.

Not agreed. While the housing survey information from Legacy Properties is welcomed, it must be noted that since their submission was written, a further 29 affordable units have been consented: 26 units at PA18/09371 (an exception site through a registered provider Coastline Housing) and three at PA18/07626. Outline planning permission for an exception site for five affordable units at PA15/05874 is presently being refashioned into a fresh application for 20 units (at least 50% affordable). In terms of the delivery of exception sites, 61 affordable units were delivered at Harvenna Heights through a registered provider Ocean Housing (09/00137; C2/09/01346; PA11/09646 and PA14/10417). In addition, the working group is aware of two registered providers making enquiries about further land within the Parish of St Enoder at the present time (for exception sites).

Statement challenging approach to location of exception sites and growth limits. [HOUSING POLICY 4]

Not agreed. The settlement boundaries along our communities, which have a very linear character, allow significant potential for the development of exception sites. In addition, the growth limits prevent the further elongation of existing settlements, as explained in the Neighbourhood Plan itself.

Request for site at St Columb Road (west of St Columb Road crossroads) to be included as an allocation within the St Enoder Neighbourhood Plan.

Not agreed. An additional allocation is not to be made. This decision was taken because of the level of extant planning consents, capacity within the settlement boundaries including HL2, the agreed location of further growth (FG1) which would provide an additional road link to Indian Queens Primary School, and the commitment to review housing delivery in 2022/2023.

Comment 3 (St Austell Brewery)

Statement objecting to how the Plan describes land outside of the settlement boundaries and the reasons for it to be safeguarded. [HOUSING POLICY 2]

Not agreed. Acknowledged that the comment stems from the non-inclusion of the Blue Anchor car park within the settlement boundary for Fraddon, Indian Queens and St Columb Road within the pre-submission draft of the Neighbourhood Plan.

Statement objecting to the policy approach to housing developments on land outside of the settlement boundaries and, in particular, the approach to infill and rounding off in small rural settlements, which specifies "one or two housing units." [HOUSING POLICY 2 and 3]

Not agreed. Paragraph 1.68 of the Cornwall Local Plan refers to "infill" sites of "one-two housing units" in "smaller villages and hamlets."

Statement objecting to the policy position that there would be no rounding off on land immediately outside of the settlement boundaries. [HOUSING POLICY 2]

Not agreed. The use of settlement boundaries and related policies is consistent with many other district and Neighbourhood Plans. In addition, guidance has been sought from senior planning officers at Cornwall Council that the approach on these matters is legitimate. Acknowledged that the comment stems from the non-inclusion of the Blue Anchor car park within the settlement boundary for Fraddon, Indian Queens and St Columb Road within the pre-submission draft of the Neighbourhood Plan.

Statement objecting to the policy position that housing developments on land immediately outside of the settlement boundaries should be as exception sites. [HOUSING POLICY 2]

Not agreed. A key priority for the Plan is the provision of affordable housing, which would be assisted by this policy. Acknowledged that the comment stems from the non-inclusion of the Blue Anchor car park within the settlement boundary for Fraddon, Indian Queens and St Columb Road within the pre-submission draft of the Neighbourhood Plan.

Request for previously-developed land at Fraddon (part of car park associated with Blue Anchor public house) to be included within the settlement boundary for Fraddon, Indian Queens and St Columb Road within the pre-submission draft of the Neighbourhood Plan.

Agreed. In considering this request, the working group noted that the likely development would be no more than five residential units and would safeguard the car park for the pub. It was further noted that the land was previously developed land and had previously been included within the settlement boundary set out in the Restormel Local Plan. The settlement boundary has therefore been changed to something akin to what was in the Restormel Local Plan.

Statement objecting to EMPLOYMENT POLICY 2, which seeks to prevent the loss of commercial premises to housing. A suggested, more permissive, wording was supplied.

Not agreed. The policy safeguards commercial premises and their associated car parking areas, and does not hinder developments. However some supporting text has been added in terms of support for developments to boost the viability of commercial premises.

Comment 4 (Mr Treve Kessell and Mr John Vercoe)

Request for five fields at Fraddon (west of St James View, Westbourne Terrace and Vincent Tractors) to be included as an allocation within the St Enoder Neighbourhood Plan.

Not agreed. An additional allocation is not to be made. This decision was taken because of the level of extant planning consents, capacity within the settlement boundaries including HL2, the agreed location of further growth (FG1) which would provide an additional road link to Indian Queens Primary School, and the commitment to review housing delivery in 2022/2023.

Comment 5 (Mr John Roberts)

Request for site at Little Halloon Farm, Indian Queens, to be included within the settlement boundary for Fraddon, Indian Queens and St Columb Road.

Decision on this request has yet to be taken.

Comment 6 (Mr Andrew Brewer)

Number of comments that land outside principally identified areas should not be excluded from development and more land should be allocated for development.

Noted. It is the view of the working group that the policies provide a good balance between housing delivery and protection of the countryside. No additional large allocation have been made to be Plan. This decision was taken because of the level of extant planning consents, capacity within the settlement boundaries including HL2, the agreed location of further growth (FG1) which would provide an additional road link to Indian Queens Primary School, and the commitment to review housing delivery in 2022/2023.

Comment that land should not be excluded from possible use as exception sites.

Not agreed. The settlement boundaries along our communities, which have a very linear character, allow significant potential for the development of exception sites. In addition, the growth limits prevent the further elongation of existing settlements, as explained in the Neighbourhood Plan itself.

Comment that opportunities for self-build and individual houses should be looked at in the Neighbourhood Plan.

Noted. The working group considers that there is scope in the Plan for self-build properties as part of larger developments, plus individual properties in rural hamlets.

Comment that growth within hamlets should not be discounted and that two-three dwellings might not be inappropriate.

Agreed. HOUSING POLICY 3 supports infill and rounding off of one-two units in rural hamlets. It is consistent with paragraph 1.68 of the Cornwall Local Plan which refers to "infill" sites of "one-two housing units" in "smaller villages and hamlets." The working group agreed that developments in these areas needed to be small-scale, but decided to revise the wording of the policy to "normally one or two housing units" to add a little more flexibility.

Comment that protecting employment is imperative and new buildings can respect natural landscapes and that people need to be careful not to be stuck in the past.

Agreed. The working group has modified EMPLOYMENT POLICIES 1 and 4 to better support the provision of employment opportunities in rural area.

Suggestion that without more growth, the villages within St Enoder Parish could stagnate.

Not agreed. The Plan reflects feedback from local residents and follows many years of significant growth. It also delivers those targets set out in the Cornwall Local Plan, but the Plan only has a lifespan until 2030, by which time a replacement policy document will have needed to be produced.

Statement questioning the car parking standards within TRAFFIC POLICY 2.

Not agreed. Many Neighbourhood Plans have similar "two-car" policies and this Plan includes a "special circumstances" clause where it would not be possible for developments to make provision for two car parking spaces.

Statement pointing out that the natural development of business will lead to more traffic and that TRAFFIC POLICY 3 was not appropriate.

Agreed that policy would be inappropriate and unworkable. Change to document has been made.

Comment that he manages the Harvenna and Ennis Barton SINC through a management plan with the Forestry Commission.

Noted. Supporting text has been added.

Statement requesting possible addendum for land to be allocated for wind turbines.

Noted. Working group felt that an addendum could potentially be considered in the future, should detailed proposals be worked up and presented for consultation. It was also noted that there was a significant level of opposition to wind turbines in St Enoder Parish.

Comment 7 (Mr Anthony Whetter)

Note that the Housing Land allocation HL3 is described as to the west of Lindsay Field. This should state east.

Agreed. Change to document has been made.

Comment 8 (Mr Peter Hooper)

Note that the residential property known as Fort Wayne has been included within the employment land allocation EL4 and request that the dwelling be placed outside EL4.

Agreed. Change to document has been made.

Comment 9 (Vincent Tractors)

Representation that the Vincent Tractors complex lies within the employment land allocation EL4, expressing concern about future flexibility should the business have difficulties.

Noted. No changes to the document, though noted that the status of the site should be reviewed when the present Plan is revised in advance of 2030.